

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JERRY PINNELL, JEREMY FERNANDEZ)
AND SHANE PERRILLOUX, individually)
and on behalf of all others similarly situated,)

Plaintiffs,)

v.)

TEVA PHARMACEUTICALS USA, INC.,)
BOARD OF DIRECTORS OF TEVA)
PHARMACEUTICALS USA, INC., TEVA)
PHARMACEUTICALS USA, INC.)
INVESTMENT COMMITTEE, and JOHN)
AND JANE DOES 1-30.)

Defendants.)

**CIVIL ACTION NO.:
2:19-CV-05738-MAK**

**DECLARATION IN SUPPORT OF PLAINTIFFS' RENEWED UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT,
PRELIMINARY CERTIFICATION OF SETTLEMENT CLASS, APPROVAL OF
CLASS NOTICE AND SCHEDULING OF A FAIRNESS HEARING**

I, Mark K. Gyandoh, Esquire, as Class Counsel, declare as follows:

1. I am a member in good standing of the bar of the Commonwealth of Pennsylvania and have personal knowledge of the facts set forth below and, if called as a witness, I could and would testify competently thereto.
2. I am chair of the Fiduciary Practice Group at Capozzi Adler, P.C., and have been the lead attorney for my firm in this litigation representing Plaintiffs and the proposed Settlement Class in the above-captioned action.
3. I have been actively involved in all stages of this lawsuit, including investigating and preparing the Complaint and Amended Complaint, and settling this litigation.

4. Attached hereto as Exhibit 1 is the original executed Settlement Agreement with revised exhibits. In particular, Exhibits A (Settlement Notice), B (Plan of Allocation), and C (Preliminary Approval Order) have been revised.

5. Attached hereto as Exhibit 2 is a redline of the revised Plan of Allocation indicating changes made to the previous Plan of Allocation.

6. Attached hereto as Exhibit 3 is a redline of the revised Preliminary Approval Order indicating changes made to the previous Preliminary Approval Order.

7. Attached hereto as Exhibit 4 is a redline of the revised Settlement Notice indicating changes made to the previous Settlement Notice.

I declare, pursuant to 28 U.S.C. §1746 and under penalty of perjury, the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 4th day of December 2020, in Merion Station, Pennsylvania.

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh.
Mark K. Gyandoh, Esquire
312 Old Lancaster Road
Merion Station, PA 19066
markg@capozziadler.com
(610) 890-0200
Fax (717) 233-4103

Class Counsel